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Attorneys for Defendant
Midland Credit Management, Inc.

UNITED STATE DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

NICOLE CHAMBERS,

Plaintiff,

vs.

MIDLAND CREDIT MANAGEMENT, INC.,
AND Does 1 Through 6, inclusive

Defendants.

) CASE NO.: 2:21-CV-01344-JAM-CKD

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**STIPULATION EXTENDING TIME TO
RESPOND TO THE COMPLAINT AND
ORDER**

Complaint Filed: April 16, 2021

Pursuant to Local Rule 144(a), Plaintiff Nicole Chambers and Defendant Midland Credit Management, Inc. ("Midland") (together, the "Parties"), by and through their respective counsel of record, jointly stipulate and agree as follows:

RECITALS

1. Whereas, on April 17, 2021, Plaintiff filed his Complaint in this action in the Superior Court of the State of California, County of San Joaquin. ECF No. 1.
2. On July 30, 2021, Midland removed this action to this Court. ECF No. 1.
3. Midland's current deadline to respond to Plaintiff's Complaint is August 6, 2021.
4. The parties are continuing to explore settlement of the litigation.

5. The extension is not for purposes of delay and will not result in any prejudice to the parties or to the Court.

STIPULATION

WHEREFORE, the Parties stipulate and agree that the deadline for Midland to respond to the Complaint is extended for 32 days to September 7, 2021.

IT IS SO STIPULATED.

Dated: August 5, 2021

Respectfully submitted,

LOCKE LORD LLP

By: /s/ Meagan S. Tom

Meagan S. Tom

Attorneys for Defendant Midland Credit Management, LLC

Dated: August 5, 2021

Respectfully submitted,

AMERICAN DEBT LAW

By: /s/ Cole W. Yeargin

Cole W. Yeargin

Attorneys for Plaintiff Nicole Chambers
(as authorized on August 3, 2021)

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ORDER

Pursuant to the stipulation of the parties, and good cause appearing, the Court hereby orders as follows:

1. Midland's response deadline is extended to September 7, 2021.

IT IS SO ORDERED.

DATED: August 5, 2021

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE